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BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

DEPT. OF TRANSPORTATION  
DOCKETS

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NEW U.S.-ARGENTINA COMBINATION  
SERVICE OPPORTUNITIES

Docket OST-99-6210-357

Application of  
DELTA AIR LINES, INC.  
under 49 U.S.C. 41102 and 41108 for a certificate  
of public convenience and necessity and allocation  
of frequencies (New York-Buenos Aires)

Docket OST-01-9984-4

Application of  
AMERICAN AIRLINES, INC.  
for allocation of seven weekly U.S.-Argentina  
frequencies (Dallas/Ft. Worth-Buenos Aires)

Docket OST-2001-10008-4

CONSOLIDATED ANSWER OF UNITED AIR LINES, INC.

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**BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.**

<div style="display: flex; justify-content: space-between; align-items: center;"><div>NEW U.S.-ARGENTINA COMBINATION SERVICE OPPORTUNITIES</div><div>) ) ) )</div></div>	Docket OST-99-6210
<div style="display: flex; justify-content: space-between; align-items: center;"><div>Application of DELTA AIR LINES, INC. under 49 U.S.C. 41102 and 41108 for a certificate of public convenience and necessity and allocation of frequencies (New York-Buenos Aires)</div><div>) ) ) ) ) ) )</div></div>	Docket OST-01-9984
<div style="display: flex; justify-content: space-between; align-items: center;"><div>Application of AMERICAN AIRLINES, INC. for allocation of seven weekly U.S.-Argentina frequencies (Dallas/Ft. Worth-Buenos Aires)</div><div>) ) ) ) ) ) )</div></div>	Docket OST-2001-10008

**DATED: July 10, 2000**

**CONSOLIDATED ANSWER OF UNITED AIR LINES, INC.**

United Air Lines, Inc. ("United") submits the following consolidated answer in opposition to the above-captioned applications Delta Air Lines Inc. ("Delta") and American Airlines Inc. ("American"), and to Delta's Motion to Consolidate, dated June 28, 2001. United's opposition is based upon its request for immediate activation of the backup authority awarded to it by Order 01-1-14. United will use its backup authority to start daily nonstop Washington Dulles-Buenos Aires service on December 1, 2001.

**I. INTRODUCTION**

In September 1999, United, Continental and Delta started a lengthy and costly journey to gain a portion of the 14 newly available U.S.-Argentina frequencies.

(Department's Notice, September 8, 1999 in *1999 U.S.-Argentina Combination Service Case*). One year and four months later, the Department issued its decision and awarded Delta seven frequencies to operate Atlanta-Buenos Aires service starting on April 1, 2001 and Continental seven frequencies to operate daily Newark-Buenos Aires service starting December 1, 2001. (Order 01-1-14). United was not granted any U.S.-Argentina frequencies. In order to maximize the public benefit of the frequencies, however, United was awarded backup authority to Continental's seven U.S.-Argentina frequencies in the event Continental failed to use them in a timely fashion. *Id.*

On June 6, 2001, Continental filed a request in Docket OST-01-9853 to delay the December 1, 2001 start-up date for a full year to December 1, 2002. The Department's award to Continental was contingent on the requirement that it commence service on December 1, 2001, when the frequencies became available under the bilateral agreement. The Department specifically stated that the award will be "subject to start up conditions....[and that the Department] will require that Continental begin services no later than December 1, 2001." (Order 01-1-14 at 10). The Department recognized the value of these route rights and wanted to ensure that these rights were used efficiently and expeditiously.

It is standard practice for the Department to grant backup awards in certificate cases for the first year of authorized operations. The backup award goes into effect if "the primary carrier [does] not use all of the frequencies allocated to it for its services." (Order 01-1-14 at 10). Because Continental has stated that it will not use its frequencies

on December 1, 2001, the Department should immediately activate United's backup authority.

United is ready, willing and able to start new daily nonstop service between the U.S. and Argentina on December 1, 2001, pursuant to its backup authority. A schedule for these services is attached as Exhibit UA-101. United would like the flexibility to use these frequencies for daily nonstop Washington Dulles-Buenos Aires service starting December 1, 2001. As United has previously stated, it needs this flexibility to use its backup frequencies in order to start services with a smaller B767 aircraft, which is better suited to the present market conditions and costs than is the B777 proposed for the Los Angeles service. United can start operating its backup frequencies with B767 equipment at Washington Dulles as soon as the frequencies become available.

United's daily nonstop services between Washington Dulles and Buenos Aires would benefit passengers throughout the United States served by United's superior U.S. network. This service would be the only nonstop service by any carrier - U.S. or foreign - between Washington Dulles and Buenos Aires. By introducing this new gateway to Argentina and Latin America, United's proposal offers passengers and shippers an important alternative to existing services in the U.S.-Argentina market and therefore promotes intergateway competition.

Delta and American have also filed applications for Continental's unused frequencies, Delta for New York JFK service and American for Dallas/Ft. Worth service. (Dockets OST-01-9984 and OST-01-10008 respectively). Both these carriers argue that

United's backup authority is nullified by the fact that United would like the flexibility to use its backup frequencies at Washington Dulles instead of Los Angeles. Their arguments, however, completely miss the point of United's backup award as United was selected for backup authority not because of its proposal to serve Los Angeles but because of its ability to start service quickly in the event of Continental's default. Moreover, United, unlike Delta or American spent over a year pursuing the backup authority in the *1999 Argentina* case and devoted considerable resources to this pursuit. The Department would have rewarded these efforts by issuing United the backup award regardless of whether United had proposed service at Washington Dulles or Los Angeles. Washington Dulles, like Los Angeles, is both a United hub and one of the largest U.S. gateways without nonstop service.

Unlike United, American chose not to participate in the *1999 Argentina* proceeding but now wants to come in and further strengthen its position in the U.S.-Latin American market by grabbing seven more U.S.-Argentina frequencies.<sup>1</sup> Delta requested only seven frequencies in the *1999 Argentina* proceeding and was awarded all seven frequencies it requested for its Atlanta-Buenos Aires services, which it started in April. United vigorously participated in the proceeding, was the only carrier not receiving a

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<sup>1</sup> According to recent reports, American is by far the largest carrier in the U.S.-Latin America market. In the year 2000, American operated 49% of U.S. carrier capacity and collected 52% of the revenues and 51% of the operating profit in this geographic area. AVIATION DAILY, July 6, 2001, at 5.

primary award and was the only carrier awarded authority to backup Continental's Newark-Buenos Aires service.

The Department should dismiss the Delta and American applications and immediately activate United's backup frequency allocation. No carrier selection proceeding is required in this instance for reasons United has already explained.<sup>2</sup> Any carrier selection proceeding will deprive the public of a December 1, 2001 start up for these frequencies, as such a proceeding could not realistically be completed in time to allow service to be introduced by that time. Immediate activation of the backup authority is necessary in order to allow United enough time to prepare for a December 1, 2001 start up. Even if the Department were to choose among the proposals of United, Delta, and American, however, United's backup service proposal at Washington Dulles would be chosen as that which would best serve the public interest.

## **II. UNITED'S WASHINGTON DULLES PROPOSAL WOULD OFFER SUPERIOR PUBLIC BENEFITS**

Washington is an ideal gateway to Argentina and Latin America. It has one of the largest Latino populations in the country and the numbers are growing at an impressive rate. The 2000 U.S. Census data shows that from 1990 to 2000, the Washington area's Latino population has grown at a rate of 88 percent. Close to half a million Latinos

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<sup>2</sup> See United's Consolidated Reply, dated July 2, 2001, in Dockets OST-99-6210 and OST-01-9853. United incorporates that pleading by reference in support of the relief requested in this answer.

currently live in the Washington area. The area's growing Latino population represents ten percent of Washington area residents and a large and lucrative air travel market to Argentina and Latin America. Specifically, the local Washington-Buenos Aires market is the fifth largest in the country and the only market in the top five without any scheduled nonstop service. See Exhibit UA-101.<sup>3</sup>

In addition to the substantial Latino population, Washington is also the leading international political-economic center whose decisionmakers strongly influence the direction of the Latin American economy. Several international financial institutions are headquartered in Washington, including the World Bank, the International Monetary Fund, and Inter-American Development Bank. Washington is also the location of U.S. government agency headquarters and foreign embassies as well as the Organization of American States. These government institutions generate traffic to a major international destination such as Buenos Aires. The Washington area also houses the "Silicon Valley of the East Coast" with some of the world's largest and most powerful technology companies such as Nextel, AOL TimeWarner, WorldCom, Oracle and Cisco, just to name a few. These companies have expansive operations all around the world, including in Argentina and other South American countries. Both Nextel and Oracle, two of the

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<sup>3</sup> The other top five markets are Miami, New York, Chicago and Los Angeles. Each of those cities receives nonstop services operated by U.S. or foreign carriers. Although Aerolineas Argentinas has suspended service at Miami, New York and Los Angeles, this is a temporary measure and it is likely that nonstop service will be restored when Aerolineas has resolved its present corporate and financial problems.

largest technology companies in the world, have a significant presence both in Washington and in Buenos Aires. Oracle's president recently stated that he sees Argentina as a critical economic market for the company, "Argentina can act as a hub in Latin America. It has enormous potential." (Washington Times, *Special International Report*, June 13, 2000). United's Washington Dulles-Buenos Aires service represents both employment and tourism opportunities for the National Capital area as well as needed transportation services for its business and government communities.

### **III. WASHINGTON DULLES IS THE IDEAL NEW GATEWAY TO BUENOS AIRES**

There is a critical need for daily nonstop service between Washington Dulles and Buenos Aires. Washington is the largest U.S.-Argentina market without any scheduled nonstop service, and United is uniquely positioned to fill this gap because of its hub at Washington Dulles.

In 1999, Airports Council International rated Washington Dulles the fastest growing airport in the world. It is the major transportation hub in the mid-Atlantic region with a thriving international service, and a critical link in the world's aviation system. Expansion of international service is critical to Washington Dulles' continued success and growth. The airport's annual growth rate is well over eight times the average industry growth rate. United and the Metropolitan Washington Airports Authority have invested more than a billion dollars in improving and expanding capacity of the Dulles facilities and intend to implement significant additional upgrades to customer service in



the next five years. Currently, Washington Dulles serves 20 million passengers; however, it has the land capacity to serve up to 55 million passengers. This capability makes Dulles an excellent choice for service to and from Buenos Aires because it has the ability to grow along with the market.

In 1999, United began to strongly position itself at Dulles by increasing its services by 60 percent. Daily departures increased from 73 to 117, with 31 new international and 13 new domestic flights. United has made a substantial commitment to make Dulles a first class international hub. From Washington Dulles, United currently operates 340 daily nonstop frequencies, offering services to 65 U.S. and 18 international cities. See Exhibit UA-103. In addition, United's proposed nonstop service would offer one-stop connections to Buenos Aires from 60 domestic and 14 international destinations served by United. See Exhibit UA-104. United's pursuit of new international service opportunities, including its new route to Buenos Aires, is an integral part of its effort to make Dulles the world class hub that the nation's capital deserves.

#### **IV. UNITED WOULD OPEN A NEW GATEWAY TO ONE OF THE LARGEST LOCAL BUENOS AIRES MARKETS.**

United is the only carrier proposing a new gateway for the largest O&D market without any scheduled nonstop service. The Department has long emphasized the competitive importance of introducing new gateways to Latin America. *See, e.g., U.S.-Brazil Combination Case*, Order 99-3-26 (Houston favored over New York or Los Angeles where those cities already had nonstop service to Brazil) and *U.S.-Colombia*

*Combination Case*, Order 93-9-12 (Houston selected over Miami where the latter already had nonstop service to Colombia). In the *U.S.-Brazil* proceeding, *supra*, Continental aggressively and repeatedly argued that its application for the Houston-Sao Paulo service was superior to other applications, because of its proposal to introduce Houston as a new gateway to Brazil and South America. The Department agreed with that assertion and stated that the introduction of a new gateway was “a strong factor in Continental’s selection.” (Order 99-3-26 at 6).

In addition, the Department has declared that when there are restrictions applicable to U.S. carrier rights to a foreign country, such as apply to Argentina at present, “the opening of a new U.S. gateway for international service has been a significant consideration in carrier selection cases.” (Order 99-4-14 at 5) United is the only applicant that offers new gateway service for the largest local market in the U.S. without scheduled nonstop service. Even though American has also proposed a new gateway at Dallas/Ft. Worth, that gateway serves a much smaller local market to Buenos Aires than United’s gateway at Washington. As the fifth largest local market in the U.S., Washington has approximately three times as much O&D traffic to Buenos Aires as does Dallas/Ft. Worth.<sup>4</sup>

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<sup>4</sup> See Exhibit UA-102. According to CRS booking data for 12 months ending May 2001, there were 37,500 non-directional passengers between Washington/Baltimore and Buenos Aires compared with 12,700 at DFW. Based on the Department’s O&D survey for the 12 months ending with 3<sup>rd</sup> Quarter 2000, Washington/Baltimore produced 21,300 Buenos Aires passengers compared to 7,600 at DFW.

In addition to the new gateway benefits, United's proposal will offer significant intergateway competition between existing East Coast gateways. United's Washington-Buenos Aires service will provide an important alternative gateway to Latin America – one that can provide competition to the New York, Atlanta and Miami hubs and their multitude of Latin American service. Washington offers the best opportunity to develop a truly meaningful competitive option to these existing East Coast gateways because of its enormous Latin community of business and cultural interests and United's well-developed traffic feed and connections.

**V. NO OTHER PROPOSAL OFFERS AS MANY PUBLIC BENEFITS AS UNITED'S DOES AT WASHINGTON.**

**A. Delta's New York gateway already has nonstop service by multiple carriers**

Delta's proposal to initiate New York JFK-Buenos Aires nonstop service would make Delta the fourth nonstop carrier in the New York-Argentina market and the third nonstop U.S. carrier. American and United offer daily nonstop service from New York to Buenos Aires, and Aerolineas Argentinas, which recently suspended service, will most likely re-enter the New York market once its management and economic troubles have stabilized. The presence of multiple nonstop carriers already ensures adequate service in the New York-Argentina market. Delta's proposed New York-Buenos Aires service would bring neither meaningful additional competition nor demonstrable public benefits to the well-served New York area. By contrast, United would introduce a new

U.S. gateway to Argentina and provide a valuable alternative for passengers and shippers in the largest O&D air service market that lacks scheduled nonstop service to Buenos Aires.

Delta states in its pleading that Continental's decision to default on its award gives the Department an opportunity "to substitute Delta for Continental as a powerful new entrant." (OST-01-9984 at 2). Delta, however, is not a "substitute" for Continental as it fails to satisfy the two primary reasons why the Department granted Continental seven frequencies in the *1999 Argentina* case. The first and foremost reason was Continental's status as a new entrant in the U.S.-Argentina market, and the second, Continental's ability to offer inter-airport competition between the two international airports in the New York area, JFK and Newark. Delta does not satisfy either of these requirements.

As to the first reason, the Department specifically states that its primary consideration in choosing Continental was the fact that Continental was a new entrant and would "offer consumers [an] additional airline choice for service to Argentina." (Order 01-1-14 at 7). Delta is not a new entrant in the market as it is already serving Buenos Aires out of its largest hub, Atlanta. It cannot, therefore, provide the kind of benefit that Continental brought as a new entrant. As the Department recently demonstrated by its decision in the DCA beyond perimeter slot proceeding, one service is sufficient to

remove a carrier from the “new entrant” category.<sup>5</sup> (Order 01-6-20). The Department emphasized the importance of being a true new entrant in the DCA slot decision by choosing Alaska Airlines over carriers, such as Frontier, that had as few as a single daily roundtrip frequency in the DCA market. (Order 01-6-20) In that order, the Department stated that even though Frontier, National and America West have limited presence in the DCA market, Alaska “is the only clearly qualified true new entrant in this proceeding.” (*Id.* at 8). According to the Department’s criteria for new entrants, Delta is not a new entrant to Argentina and can no longer be selected as one.<sup>6</sup>

As to the second reason, the Department states that by giving Continental these frequencies it is providing “passengers in the New York/Newark area . . . the important choice of airport.” (Order 01-1-14 at 8) Delta, however, does not provide any competition between the two international airports in the New York area as it proposes to use New York JFK which is the airport chosen by two other U.S. carriers, as well as

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<sup>5</sup> This DCA proceeding was initiated when, as a result of the AIR-21, 12 slot exemptions became available under 49 U.S.C. §49109 for nonstop service outside the 1,250 mile perimeter established for operations at DCA. Under the provisions of this allowance, TWA was granted two slot exemptions to provide nonstop service to Los Angeles, California. Subsequently, American acquired TWA’s assets and since the DCA slot exemptions could not be transferred, the Department instituted a proceeding to reallocate the two slots.

<sup>6</sup> Because Delta already operates services at Atlanta to all the U.S. points it would serve from New York JFK, it cannot claim to be a “new entrant” in any beyond gateway markets either.

Aerolineas Argentinas. Based on the facts outlined above, “substitution” of Delta cannot provide the kind of public benefits that Continental was chosen to provide.

B. American’s Proposal Fails to Maximize Public Benefit.

On June 25, 2001, American applied for the allocation of Continental’s seven U.S.-Argentina frequencies for Dallas/Ft. Worth-Buenos Aires service. As noted earlier, even though American’s proposal at Dallas/Ft. Worth introduces a new gateway to Argentina, the local Dallas/Ft. Worth market is significantly smaller than Washington’s. In fact, Dallas/Ft. Worth’s local market is one third the size of the local market in Washington.

Moreover, an award of seven additional frequencies to American would only further strengthen that carrier’s already overwhelming competitive position in the U.S.-Latin America market. American already dominates the other two major “deep” South American markets, Brazil and Chile. American has 49 U.S.-Brazil frequencies, nearly half of the total U.S. carrier weekly frequencies to Brazil, compared to United’s 28 frequencies, Continental’s 18 frequencies and Delta’s 10 frequencies. In Chile, supported by its strategically located hub at Miami and its immunized alliance with LAN Chile, American operates twice as many daily services as any other U.S. carrier. In Argentina, American already has the same number of frequencies as United, 21. In these circumstances, awarding more frequencies to American would only further distort competition in this region.

By granting United the frequencies for the large but underserved Washington market, the Department would be addressing a vital need for a strong U.S. challenges to American in the U.S.-Argentina market. United is the only carrier that could effectively challenge American's market strength in the U.S. "deep" South America markets. United already has a presence in the U.S.-Argentina market and has invested significant time and resources to developing a supporting network. The Department would maximize the competitive potential of these frequencies by allowing United to use its backup allocation at Washington.

Furthermore, American already has sufficient frequencies to serve Dallas/Ft. Worth. without compromising competition at any of its other gateways or depriving its passengers in the western and southern U.S. of service. While United and American both have 21 weekly Argentina frequencies, United has geographically diversified its operations by offering service from multiple gateways (Miami, Chicago, JFK) whereas American has chosen to offer duplicative service between Miami and Buenos Aires. In 1998, United opened a new gateway to Argentina from its Chicago hub, providing valuable new nonstop flights to its passengers in the Midwest. American, however, has used 14 of its 21 frequencies to offer double daily services at Miami, where it dominates a critical gateway to Argentina and Latin American.

A large portion of passengers that fly on American's Miami flights to Buenos Aires could equally well or better connect over American's Dallas/Ft. Worth hub. Upwards of 50% of the traffic currently accessing Buenos Aires over Miami on

American could shift to flights over Dallas/Ft. Worth. American could easily move seven Miami frequencies to Dallas/ Ft. Worth to satisfy this traffic. Significantly, American can make this move without sacrificing any connections at Miami as its two Miami-Buenos Aires flights depart within approximately one hour of each other. In addition, this move will not compromise competition at Miami or deprive American's southeastern passengers of service, as American would still retain sufficient frequencies to offer daily service to Buenos Aires from Miami.

Unlike American, United does not have the luxury of moving any of its exiting frequencies without significantly diminishing competition in key markets or eliminating a critical gateway access to Argentina. If United moved any of its services to accommodate Washington Dulles passengers, either one of the two largest U.S.-Argentina markets (Miami and New York/JFK) would be deprived of the only competition against American, the dominant carrier between the U.S. and South America, or it would leave United's Chicago hub and the entire Midwest without nonstop service to Buenos Aires.

## **VI. CONCLUSION**

In order to assure that the U.S.-Argentina frequencies negotiated in the recent bilateral amendments would be translated into timely public benefits, the Department granted United authority to backup Continental's seven U.S.-Argentina frequencies. Continental's failure to use the frequencies as mandated by the Department gives the



Department an opportunity to activate United's backup authority to provide nonstop service to the largest local U.S.-Argentina market without scheduled service. As United is ready to use the backup authority granted to it by the *1999 Argentina* case, there is no need for a reopened carrier selection case.<sup>7</sup> Even if, however, the Department were to engage in carrier selection, as urged by Delta and American, United's proposal is the most beneficial to the U.S. consumer as demonstrated herein. United would open a new gateway to Argentina in the largest U.S. market without scheduled nonstop service and would serve a significant number of passengers and shippers that presently do not have any nonstop service. On the basis of the foregoing, United Air Lines, Inc. respectfully requests that the Department activate United's backup award of seven U.S.-Argentina frequencies in order for United to provide daily nonstop service between Washington and Buenos Aires, consistent with the public interest and its decision in Order 01-1-14. In addition, and consistent with the foregoing, the applications of Delta and American in Dockets OST-01-9984 and OST-01-10008 should be dismissed and their requests to

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<sup>7</sup> See Consolidated Reply of United, *supra*, footnote 2.

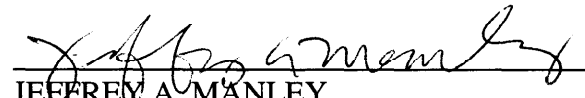
Department an opportunity to activate United's backup authority to provide nonstop service to the largest local U.S.-Argentina market without scheduled service. As United is ready to use the backup authority granted to it by the *1999 Argentina* case, there is no need for a reopened carrier selection case.<sup>7</sup> Even if, however, the Department were to engage in carrier selection, as urged by Delta and American, United's proposal is the most beneficial to the U.S. consumer as demonstrated herein. United would open a new gateway to Argentina in the largest U.S. market without scheduled nonstop service and would serve a significant number of passengers and shippers that presently do not have any nonstop service. On the basis of the foregoing, United Air Lines, Inc. respectfully requests that the Department activate United's backup award of seven U.S.-Argentina frequencies in order for United to provide daily nonstop service between Washington and Buenos Aires, consistent with the public interest and its decision in Order 01-1-14. In addition, and consistent with the foregoing, the applications of Delta and American in Dockets OST-01-9984 and OST-01-10008 should be dismissed and their requests to set

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<sup>7</sup> See Consolidated Reply of United, *supra*, footnote 2.

down a carrier selection case and consolidate their applications with United's request to activate its backup award should be denied.<sup>8</sup>

Respectfully submitted,

  
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**DATED: July 10, 2001**

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<sup>8</sup> American, unlike Delta, did not file a motion to consolidate but appears implicitly to request such relief in its Consolidated Answer, dated June 25, 2001, in Dockets OST-01-9984 and OST-99-6210 at 2-3.

## ***United's Proposed DCA-EZE Nonstop Service Schedule***

### **Summer Daily Service Schedule**

<b>Origin</b>	<b>Depart</b>	<b>Arrive</b>	<b>Destination</b>
IAD	9:40 p.m.	9:20 a.m.	EZE
EZE	9:40 p.m.	7:20 a.m.	IAD

### **Winter Daily Service Schedule**

<b>Origin</b>	<b>Depart</b>	<b>Arrive</b>	<b>Destination</b>
IAD	9:40 p.m.	9:20 a.m.	EZE
EZE	9:40 p.m.	7:35 a.m.	IAD

Note: All times shown are local; all service on Boeing 767-300 equipment (206 seats)

***Washington Has Nearly Three Times As Much O & D Traffic To  
Buenos Aires As Does Dallas/Ft. Worth***

<b><u>Rank</u></b>	<b><u>City</u></b>	<b><u>Non-directional Passengers</u></b>
1	Miami	766,543
2	New York	330,911
3	Los Angeles	125,845
4	Chicago	40,789
<b>5</b>	<b>Washington</b>	<b>37,491</b>
6	Atlanta	35,270
7	San Francisco	30,120
8	Orlando	29,054
9	Houston	19,849
10	Boston	19,753
11	San Juan	16,922
12	Dallas/Ft. Worth	12,696

Note: New York includes EWR, JFK and LGA; Chicago includes MDW and ORD; Washington includes BWI, DCA and IAD; San Francisco includes OAK, SFO and SJC; Houston includes HOU and IAH; and Dallas/Ft. Worth includes DAL and DFW.

Source: CRS bookings, 12ME May, 2001

***Washington Has Nearly Three Times As Much O & D Traffic To  
Buenos Aires As Does Dallas/Ft. Worth***

<b><u>Rank</u></b>	<b><u>City</u></b>	<b><u>Non-directional Passengers</u></b>
1	Miami	132,970
2	New York	121,330
3	Los Angeles	25,390
4	Chicago	21,510
<b>5</b>	<b>Washington</b>	<b>21,320</b>
6	Orlando	20,840
7	San Francisco	17,280
8	Boston	14,870
9	Houston	8,600
10	Dallas/Ft. Worth	7,630

Note: New York includes EWR, JFK and LGA; Chicago includes MDW and ORD; Washington includes BWI, DCA and IAD; San Francisco includes OAK, SFO and SJC; Houston includes HOU and IAH; and Dallas/Ft. Worth includes DAL and DFW.

Source: DB1A 4QE 3Q2000

***U.S. Cities Served Nonstop By United And United Express From Washington Dulles*****Domestic Cities**

Akron (*)	Mobile (*)
Allentown (*)	Nashville (*)
Albany (*)	New Orleans
Atlanta	New York JFK (*)
Austin	New York LGA
Baltimore (*)	Newark (*)
Binghamton (*)	Newburgh (*)
Boston	Norfolk (*)
Burlington (*)	Orlando
Buffalo (*)	Philadelphia
Charleston, SC (*)	Phoenix
Charleston, WV (*)	Pittsburgh (*)
Charlottesville (*)	Portland, ME (*)
Chicago O'Hare	Portland, OR
Cleveland (*)	Providence (*)
Columbia (*)	Raleigh/Durham (*)
Columbus (*)	Richmond (*)
Dallas	Roanoke (*)
Dayton (*)	Rochester
Denver	Sacramento
Detroit (*)	San Diego
Greensboro (*)	San Francisco
Greenville (*)	San Jose
Harrisburg (*)	San Juan
Hartford	Savannah (*)
Indianapolis (*)	Seattle
Jacksonville (*)	Staunton, VA (*)
Knoxville (*)	State College, PA (*)
Las Vegas	Syracuse (*)
Los Angeles	Tampa
Louisville (*)	Westchester County (*)
Lynchburg (*)	Williamsburg (*)
Miami	

**International Cities (including codeshares)**

Amsterdam	Milan
Antigua	Montreal
Barbados	Munich
Brussels	Ottawa
Copenhagen	Paris
Frankfurt	Tokyo
London	Toronto
Manchester	Vancouver
Mexico City	Vienna

**United Operates An Extensive Network Of Flights That Will Support Its IAD-EZE Service**

**Connections to IAD-EZE (By Arrival)**

<u>Origin</u>	<u>Flight No.</u>	<u>Departure</u>	<u>Arrival</u>
NRT	8228*	1125	1040
CPH	9403*	1040	1320
YUL	3311*	1330	1510
CDG	915	1300	1520
MUC	963	1200	1530
MOB	7746	1220	1530
BRU	951	1250	1530
VIE	9525*	1140	1530
AMS	947	1325	1540
MAN	4855*	1240	1545
MXP	971	1225	1600
SMF	208	810	1605
LAS	230	840	1607
PHX	234	905	1624
PDX	228	840	1630
AUS	1978	1217	1633
YYZ	3042*	1655	1831
FRA	977	1700	1945
LHR	925	1650	1955
ORF	7610	1905	2000
RIC	7416	1915	2000
YOW	3030*	1830	2003
MDT	7191	1925	2009
LYH	7506	1915	2010
SHD	7480	1925	2012
ROC	7295	1845	2014
SCE	7377	1919	2014
ABE	7157	1915	2015
BWI	7279	1940	2018
ROA	7206	1920	2022
PIT	7498	1915	2024
ALB	7679	1910	2030
BUF	7787	1920	2030
CAK	7232	1915	2033
SFO	186	1230	2034
CLE	7642	1920	2034
BOS	785	1900	2035
BGM	7265	1920	2035
RDU	7761	1930	2036
GSO	7758	1930	2038
CMH	7707	1935	2040
SEA	218	1250	2042
CRW	7560	1930	2042
PHF	7520	1947	2042
EWB	7699	1920	2043
CHO	7330	2007	2043
SDF	7626	1920	2045
CAE	7772	1925	2046
DFW	1184	1640	2048
SAN	214	1300	2049
GSP	7784	1930	2049
LAX	194	1250	2050
DEN	1252	1528	2050
ATL	924	1905	2050
JFK	7243	1910	2050
SAV	7790	1915	2050
BTB	7673	1919	2050
SWF	7289	1923	2050
PVD	7639	1924	2050
DTW	7602	1925	2050
SYR	7257	1925	2050
LGA	1053	1925	2052
HPN	7303	1930	2053
BDL	1971	1935	2053
JAX	7664	1905	2055
DAY	7451	1920	2055
PWM	7729	1920	2055
CHS	7670	1925	2055
SJC	192	1240	2056
ORD	366	1805	2058
PHL	197	1955	2058
TYS	7346	1915	2059
MSY	1570	1734	2100
BNA	7706	1825	2100
IND	7744	1830	2100

**Connections from EZE-IAD (By Departure)**

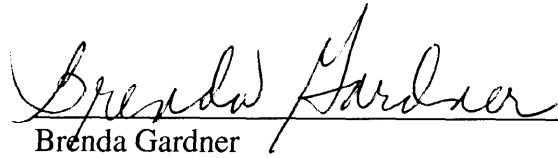
<u>Destination</u>	<u>Flight No.</u>	<u>Departure</u>	<u>Arrival</u>
GSP	7731	855	1020
PWM	7780	855	1025
BTB	7708	856	1026
LGA	198	900	1011
HPN	7216	900	1030
DTW	7645	900	1035
SDF	7621	900	1035
DEN	445	900	1042
SFO	805	900	1128
BDL	1244	904	1022
IND	7739	905	940
ALB	7674	905	1028
SYR	7311	905	1032
ROC	7176	905	1033
CLE	7657	910	1030
JFK	7382	910	1030
CAE	7777	910	1035
PVD	7634	910	1035
SWF	7284	910	1035
ATL	1903	910	1053
SEA	217	910	1148
SJC	205	910	1152
BUF	7710	915	1027
LAX	185	915	1135
YYZ	3149*	915	1040
CAK	7227	917	1047
EWB	7532	920	1026
CMH	7714	920	1040
MDT	7186	925	1016
CRW	7555	925	1042
BGM	7598	927	1046
ABE	7152	930	1039
GSO	7619	930	1040
BOS	1964	930	1101
CHO	7317	935	1010
SCE	7442	935	1034
ROA	7193	935	1039
PIT	7499	935	1050
YOW	3027*	935	1101
PHL	7690	940	1039
LYH	7501	940	1040
DFW	1023	940	1154
RIC	7259	945	1030
PHF	7515	945	1045
SHD	7475	950	1039
ORD	881	955	1053
RDU	7763	1000	1105
CHS	7563	1000	1157
SAN	211	1000	1206
ORF	7605	1010	1110
SAV	7751	1110	1250
YUL	3155*	1115	1254
JAX	7795	1120	1315
TYS	7343	1125	1323
BNA	7703	1140	1225
NRT	8227*	1230	1510
DAY	7448	1300	1440
BWI	7272	1435	1510
MOB	7681	1705	1828
PHX	233	1715	1853
FRA	916	1725	710
MUC	962	1735	755
SMF	207	1735	2009
PDX	209	1740	2024
MXP	970	1745	755
MSY	915	1745	1921
BRU	950	1750	725
CPH	9404*	1750	755
MAN	4854*	1750	555
LHR	918	1755	555
LAS	227	1755	1950
AMS	946	1800	715
AUS	1975	1800	2027
VIE	9526*	1800	910
CDG	914	1825	740

\* denotes code-share flight  
Source: OAG July 2001



**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served a copy of the foregoing Consolidated Answer of United Air Lines, Inc. on all persons named on the attached Service List by causing a copy to be sent via first-class mail, postage pre-paid.

  
Brenda Gardner

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